

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|   |   |                                   |
|---|---|-----------------------------------|
| DONALD J. TRUMP FOR PRESIDENT,<br>INC., <i>et al.</i> ,   | ) |                                   |
|   | ) |                                   |
| Plaintiffs,   | ) |                                   |
|   | ) |                                   |
| v.  | ) | Civil Action No. 2:20-cv-00966-NR |
|   | ) |                                   |
| KATHY BOOCKVAR, in her capacity as<br>Secretary of the Commonwealth of<br>Pennsylvania, <i>et al.</i> , | ) | Judge J. Nicholas Ranjan          |
|   | ) |                                   |
| Defendants.   | ) |                                   |
|   | ) |                                   |

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**DEFENDANT-INTERVENORS CITIZENS FOR  
PENNSYLVANIA'S FUTURE AND SIERRA CLUB'S  
MOTION TO COMPEL DISCOVERY FROM PLAINTIFFS**

Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club, by and through their undersigned counsel, hereby move this Court for an order compelling discovery from Plaintiffs. *See* Proposed Order. In support of this motion, Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club incorporate the accompanying Memorandum of Law.

Dated: August 12, 2020

Respectfully submitted,

/s/ Eliza Sweren-Becker

Myrna Pérez  
Eliza Sweren-Becker  
BRENNAN CENTER FOR JUSTICE  
AT NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
Telephone: 646.292.8310  
myrna.perez@nyu.edu  
eliza.sweren-becker@nyu.edu

Sascha N. Rand (*pro hac vice* forthcoming)

David Cooper (*pro hac vice* forthcoming)  
Ellyde R. Thompson (*pro hac vice* forthcoming)  
Ellison Merkel (*pro hac vice* forthcoming)  
Owen Roberts (*pro hac vice* forthcoming)  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: 212.849.7175  
[sascharand@quinnmanuel.com](mailto:sascharand@quinnmanuel.com)  
[davidcooper@quinnmanuel.com](mailto:davidcooper@quinnmanuel.com)  
[ellydethompson@quinnmanuel.com](mailto:ellydethompson@quinnmanuel.com)  
[ellisonmerkel@quinnmanuel.com](mailto:ellisonmerkel@quinnmanuel.com)  
[owenroberts@quinnmanuel.com](mailto:owenroberts@quinnmanuel.com)

*Counsel for Proposed Defendant-Intervenors  
Citizens for Pennsylvania's Future and Sierra  
Club*

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|   | ) |                                   |
| Defendants.   | ) |                                   |
|   | ) |                                   |

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**CERTIFICATE OF COUNSEL**

In accordance with § II(e) of this Court's Practices and Procedures, I certify that, on August 10, 2020, counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club (Myrna Perez) met and conferred with counsel for Plaintiffs (Ronald L. Hicks, Jr., Russell D. Giancola, Jeremy A. Mercer, Matthew E. Morgan, and Justin Clark) on Plaintiffs' objections to Defendant-Intervenors' discovery requests. Counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club and Plaintiffs were unable to resolve Plaintiffs' objections to Defendant-Intervenors' discovery requests, thus necessitating a Motion to Compel.

**[Signature on Next Page]**

Dated: August 12, 2020

Respectfully submitted,  
/s/ Eliza Sweren-Becker  
Myrna Perez  
Brennan Center for Justice  
*Counsel for Proposed Defendant-Intervenors*  
*Citizens for Pennsylvania's Future and Sierra*  
*Club*

**CERTIFICATE OF SERVICE**

I, Eliza Sweren-Becker, certify that I served the foregoing Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club's Motion to Compel Discovery from Plaintiffs on the following counsel who are registered as CM/ECF filing users who have consented to accepting electronic service through CM/ECF:

*All Counsel of Record*

Dated: August 12, 2020

Respectfully submitted,  
/s/ Eliza Sweren-Becker  
*Counsel for Proposed Defendant-Intervenors  
Citizens for Pennsylvania's Future and Sierra  
Club*